

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Ashley B. Bennett

Plaintiff,

vs.

North Penn School District, et al.

Defendants.

Civil Action No. 20-cv-05841-AB

Jury Trial Demanded

Amy L. Sacks

Plaintiff,

vs.

Perkiomen Valley School District, et al.

Defendants.

**Civil Action
No. 2:20-cv-06155-JS**

Jury Trial Demanded

**PLAINTIFFS BENNETT AND SACKS' MOTION TO CONSOLIDATE
PURSUANT TO F.R.C.P. 42 and L.R. 40.1**

Plaintiffs respectfully request this Honorable Court for an order consolidating the above cases for joint management through disposition of Motions pursuant to Rules 12 and 56, as these cases have identical legal issues and strikingly similar factual issues. These two lawsuits, seeking remedies under the First and Fourteenth Amendments to the United States Constitution, were filed as a result illegal actions on behalf of public school systems more concerned with stifling free speech than following their Constitutional obligations.

As there are common questions of law in both cases, as set forth in the accompanying Memorandum of Law, consolidation is appropriate. A proposed Order is attached.

Respectfully submitted,

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